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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DESTINEE PRICE,

Plaintiff,

vs.

KILOLO KIJAKAZI, Acting Commissioner
of Social Security,

Defendant.

Civil No. 2:23-cv-01008-VCF

UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE RESPONSE TO MOTION TO
REMAND

(FIRST REQUEST)

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the
“Commissioner”), by and through her undersigned attorneys, hereby moves for a 45-day
extension of time to file her response to Plaintiff’s motion to remand. The response is due to be
filed by October 20, 2023. This is the Commissioner’s first request for an extension of time to
file the response.

1 Defendant submits that good cause exists for this extension request because the attorney
2 tasked with writing the response has several concurrent deadlines, and needs sufficient time to
3 review the record, evaluate the issues raised in Plaintiff's motion to remand, and prepare
4 Defendant's response. Defendant's counsel will endeavor to complete these tasks as soon as
5 possible. This request is made in good faith and with no intention to unduly delay the
6 proceedings, and counsel apologizes for any inconvenience. Accordingly, Defendant requests an
7 extension in which to respond to file the response until December 4, 2023.

8 The undersigned conferred with Plaintiff's counsel, who confirmed on October 16, 2023,
9 that Plaintiff has no objection to the requested extension.

10 It is therefore respectfully requested that Defendant be granted an extension of time to file
11 the response to Plaintiff's motion to remand, through and including December 4, 2023.

12 DATED October 16, 2023

13 Respectfully submitted,

14 JASON M. FRIERSON
15 United States Attorney

16 By: s/ Michonne L. Omo
17 MICHONNE L. OMO
18 Special Assistant United States Attorney
19 Office of Program Litigation, Office 7

20 Attorneys for Defendant

21 IT IS SO ORDERED:

22 

23 UNITED STATES MAGISTRATE JUDGE

24 DATED: 10-16-2023
25